

1	IN THE UNITED STATES DISTRICT COURT	Page 1
2	WESTERN DISTRICT OF MISSOURI	
3	WESTERN DIVISION	
4	KEITH CARNES,	
5	Plaintiff,	
6	vs. Case No. 23-cv-00278-RK	
7	ROBERT BLEHM, et al.,	
8	Defendants.	
9		
10		
11		
12		
13	DEPOSITION OF RONALD WHITE, SR., a	
14	Witness, taken on behalf of the Defendants Board of	
15	Police Commissioners, Avery Williamson, Vernon Huth,	
16	Robert Blehm, Doug Niemeier, Steve Morgan, and Ed	
17	Begley, pursuant to Notice, on June 4, 2024, at the	
18	Law Offices of Wyrsh Hobbs & Mirakian, PC, One	
19	Kansas City Place, 1200 Main Street Suite 2110,	
20	Kansas City, Missouri 64105, before	
21		
22	CHERIE L. HOUSE	
23		
24	Registered Professional Reporter, Certified Court	
25	Reporter of the States of Kansas and Missouri.	

1	APPEARANCES	Page 2
2	For the Plaintiff:	
3	Mr. Wallace Hilke	
4	LOEVY & LOEVY	
5	311 North Aberdeen Street	
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7	Chicago, Illinois 60607	
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9	hilke@loevy.com	
10	For the Defendants Board of Police Commissioners,	
11	Avery Williamson, Vernon Huth, Robert Blehm, Doug	
12	Niemeier, Steve Morgan, and Ed Begley:	
13	Ms. Diane Peters	
14	WYRSCH, HOBBS & MIRAKIAN, PC	
15	1200 Main Street	
16	Suite 2110	
17	Kansas City, Missouri 64106	
18	(816) 290-7423	
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20	Also present:	
21		
22	Rose Meinrath, Law Clerk	
23		
24		
25		

Exhibit V (White's 2024 Deposition)

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5	Examination by Ms. Peters	4
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7	Certificate of Reporter	21
8	EXHIBITS	
9	Exhibit Description	Page
10	No.	
11	1 Investigative Report 03-095392	8
12	(1 page)	
13	Reporter's Note: The exhibit was retained by the	
14	court reporter to be attached.	
15		
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1	STIPULATION	Page 4
2	IT IS HEREBY STIPULATED AND AGREED	
3	by and between counsel and the deponent that the	
4	examination, reading and signature by the deponent	
5	to the above and foregoing deposition is expressly	
6	waived.	
7	PROCEEDINGS	
8	(The deposition commenced at	
9	10:02 a.m.)	
10	RONALD WHITE, SR.,	
11	a witness, being first duly sworn, testified under	
12	oath as follows:	
13	EXAMINATION	
14	BY MS. PETERS:	
15	Q. Mr. White, can you say your first and last	
16	name?	
17	A. Ronald Joe White, Sr.	
18	Q. Ronald Joe White --	
19	A. Um-hum.	
20	Q. -- Sr.?	
21	A. Um-hum.	
22	Q. Okay. What is your address?	
23	A. 2730 Jackson Avenue, Kansas City, Missouri	
24	64128.	
25	Q. Okay. And you're here today to answer	

1 some questions because I served you with a  
 2 subpoena --  
 3 **A. Um-hum.**  
 4 Q. -- correct?  
 5 **A. Um-hum.**  
 6 Q. Yes?  
 7 **A. Yes.**  
 8 Q. Okay. Sir, can -- my name is Diane  
 9 Peters.  
 10 **A. Um-hum.**  
 11 Q. I'm a lawyer. We met for the first time  
 12 this morning.  
 13 **A. Right.**  
 14 Q. You know Wally Hilke. You met him for the  
 15 first time this morning, right?  
 16 **A. Yes.**  
 17 Q. Mr. Hilke represents Keith Carnes?  
 18 **A. Um-hum.**  
 19 Q. Do you understand?  
 20 **A. Um-hum, yes.**  
 21 Q. Okay. I represent the police --  
 22 **A. Um-hum.**  
 23 Q. -- in a lawsuit that Keith Carnes has  
 24 filed against the police. Do --  
 25 **A. Yes.**

1 Q. -- you understand?  
 2 **A. Yes.**  
 3 Q. Okay. This lawsuit relates to the murder  
 4 of your nephew Larry White 20 years ago. Do you  
 5 understand that?  
 6 **A. Yes.**  
 7 Q. Okay. Can you tell me, sir, is Larry --  
 8 Larry White was your nephew?  
 9 **A. Yes.**  
 10 Q. How were you related to Larry White? And  
 11 by that, I mean was Larry White's sister or brother  
 12 your -- was Larry White's mother or father your  
 13 sibling?  
 14 **A. Hi- -- his -- his mom was my sister.**  
 15 Q. Okay. What was Larry White's mom's name?  
 16 What is -- what was Larry White's mother's name?  
 17 **A. Linda L. White.**  
 18 Q. Is Linda L. White deceased?  
 19 **A. Yes, she is.**  
 20 Q. Okay. Do you have a brother named Tim  
 21 White?  
 22 **A. Tim White is deceased.**  
 23 Q. Okay. He's your brother and is deceased?  
 24 Tim White is your brother?  
 25 **A. That's my brother.**

1 Q. And he is deceased now?  
 2 **A. He is deceased.**  
 3 Q. Okay. Sir, do you remember when your  
 4 nephew Larry White was murdered?  
 5 **A. I think it was about 2000, 2000 -- it was**  
 6 **2000, 2001, yeah, because I -- I had just got**  
 7 **back -- got back in Missouri. I wasn't here. I**  
 8 **wa- -- I was incarcerated myself, and I think I was**  
 9 **in -- back in -- back here about three days. I -- I**  
 10 **don't remember anything, though.**  
 11 Q. Okay.  
 12 **A. Nothing.**  
 13 Q. Do you remember talking to detectives  
 14 about your nephew Larry White's murder?  
 15 **A. No, I don't remember talking to no**  
 16 **detective.**  
 17 Q. Okay.  
 18 **A. Well, I know I didn't talk to no detective**  
 19 **because I had nothing to tell them. I didn't know**  
 20 **nothing. I didn't know anything. I know I didn't**  
 21 **talk to no detective. No police ever asked me**  
 22 **anything or -- or -- or anything, you know -- yeah.**  
 23 Q. Sir, can I show you a police report and  
 24 ask you some questions about it to see if maybe it  
 25 refreshes your memory?

1 **A. Sure. Yes.**  
 2 Q. Okay.  
 3 (Ronald White, Sr., Exhibit No. 1 was  
 4 marked for identification.)  
 5 Q. (By Ms. Peters) I marked this police  
 6 report as Ronald White Exhibit 1. Are you able to  
 7 read without glasses?  
 8 **A. No.**  
 9 Q. Okay.  
 10 **A. I can't read. They send me my stuff in**  
 11 **large -- large writing.**  
 12 Q. Can you read this print at all on this  
 13 page?  
 14 **A. No. Too little.**  
 15 Q. Okay.  
 16 **A. Too little.**  
 17 Q. Can I read some of it --  
 18 **A. Sure.**  
 19 Q. -- out loud to you?  
 20 **A. Sure, you can.**  
 21 Q. Okay. It says, "Ronald J. White, Sr.,"  
 22 has a date of birth 11/15/1957?  
 23 **A. Right. True.**  
 24 Q. It states that your address in 2003 was  
 25 3009 Montgall, Kansas City, Missouri; is that

<p>1 correct?</p> <p>2 <b>A. Yes, it is.</b></p> <p>3 Q. Do you recall what year you were released</p> <p>4 from prison?</p> <p>5 <b>A. I think it was 2000 -- 2001, I believe.</b></p> <p>6 <b>2001, something like that.</b></p> <p>7 Q. This report states that you talked to a</p> <p>8 detective on October 7, 2003, about Larry White's</p> <p>9 homicide. Do you recall that?</p> <p>10 <b>A. No.</b></p> <p>11 Q. This report states that you told</p> <p>12 detectives that you heard a guy named O.G. that was</p> <p>13 talking to some others about the homicide of Larry</p> <p>14 White. Do you recall that?</p> <p>15 <b>A. No.</b></p> <p>16 Q. Do you recall anyone that used the</p> <p>17 nickname "O.G."?</p> <p>18 <b>A. Do I what now?</b></p> <p>19 Q. Do you recall knowing anyone that used the</p> <p>20 nickname "O.G."?</p> <p>21 <b>A. No.</b></p> <p>22 Q. Do you know or did you know a person named</p> <p>23 Arnold Carr?</p> <p>24 <b>A. No. No.</b></p> <p>25 Q. Okay.</p>	<p>Page 9</p> <p>1 Q. And back at that time, did you want to do</p> <p>2 whatever you could to help find whoever had killed</p> <p>3 Larry White?</p> <p>4 <b>A. No. I mean, I didn't know nothing about</b></p> <p>5 <b>it, so I didn't want to get involved in this -- in</b></p> <p>6 <b>this stuff.</b></p> <p>7 Q. My -- my -- sorry, question was a little</p> <p>8 different.</p> <p>9 <b>A. Um-hum.</b></p> <p>10 Q. If you had information about Larry</p> <p>11 White -- and I know you don't remember knowing</p> <p>12 anything --</p> <p>13 <b>A. Um-hum.</b></p> <p>14 Q. -- but if you had information about Larry</p> <p>15 White's murder, would you have given that</p> <p>16 information to police?</p> <p>17 <b>A. I mean, if it -- if it was true, I would,</b></p> <p>18 <b>you know, but all I -- all I -- all I heard was -- I</b></p> <p>19 <b>know they was selling dope, and that's why he got</b></p> <p>20 <b>killed over dope-selling. That was it.</b></p> <p>21 Q. And who told you that Larry White was</p> <p>22 killed over dope-selling?</p> <p>23 <b>A. Who was it that told me that? Somebody</b></p> <p>24 <b>told me he got killed around the corner selling</b></p> <p>25 <b>dope, and he got killed for selling dope on they --</b></p>
<p>Page 10</p> <p>1 <b>A. Hum-um.</b></p> <p>2 MS. PETERS: Wally, I don't think I</p> <p>3 have any further questions if you have any</p> <p>4 follow-up.</p> <p>5 MR. HILKE: Good.</p> <p>6 EXAMINATION</p> <p>7 BY MR. HILKE:</p> <p>8 Q. Mr. White, as Ms. Peters just mentioned,</p> <p>9 my name is Wally Hilke.</p> <p>10 <b>A. Um-hum.</b></p> <p>11 Q. I'm the lawyer for Keith Carnes.</p> <p>12 <b>A. Um-hum.</b></p> <p>13 Q. And he's brought a lawsuit against the</p> <p>14 Kansas City Police Department.</p> <p>15 <b>A. Um-hum.</b></p> <p>16 Q. When Larry White -- when your nephew Larry</p> <p>17 White was murdered and you were living at 3009</p> <p>18 Montgall, who were you living with at the time?</p> <p>19 <b>A. My mother was living then, Juanita White.</b></p> <p>20 Q. And is Juanita White now deceased?</p> <p>21 <b>A. Yes, she is.</b></p> <p>22 Q. And after Larry White was murdered, did</p> <p>23 you and Juanita White or anyone else in your family</p> <p>24 talk about who you thought killed Larry White?</p> <p>25 <b>A. No. No.</b></p>	<p>Page 11</p> <p>1 <b>on they turf or something, you know, but I can't</b></p> <p>2 <b>say. I don't even remember who told me that now.</b></p> <p>3 Q. When you say "around the corner," was this</p> <p>4 location where Larry White was killed, was that</p> <p>5 pretty close to where you lived on 3009 --</p> <p>6 <b>A. About --</b></p> <p>7 Q. -- Montgall?</p> <p>8 <b>A. About three blocks -- three blocks over</b></p> <p>9 <b>there on -- over on Prospect, you know, as far as I</b></p> <p>10 <b>know.</b></p> <p>11 Q. And according to the police report that we</p> <p>12 have from this investigation --</p> <p>13 <b>A. Um-hum.</b></p> <p>14 Q. -- it says that back in 2003 you were</p> <p>15 using crack cocaine; is that correct?</p> <p>16 <b>A. 2003?</b></p> <p>17 Q. Um-hum, at the time Larry White was</p> <p>18 murdered.</p> <p>19 <b>A. No.</b></p> <p>20 Q. And I'm -- I apologize if this seems like</p> <p>21 a personal question. It's not because I'm</p> <p>22 interested myself. It's because I want to know if</p> <p>23 what's in the report is true.</p> <p>24 Was there a time in your past when you did</p> <p>25 buy and use illegal drugs?</p>

1 **A. I used to use illegal drugs, yeah, but**  
 2 **that -- that was before I went to -- to prison and**  
 3 **got out. You know, I did -- I did time there, got**  
 4 **out, and went back and fenced off all my time. And**  
 5 **that was back then. That was back in about -- it's**  
 6 **been a long time. It's been a long time.**

7 Q. At the time your nephew Larry White was  
 8 murdered, had you stopped using illegal drugs?

9 **A. Yes. I haven't used no illegal -- illegal**  
 10 **drugs and no -- no type of drugs. I don't even**  
 11 **drink.**

12 Q. Okay. So I want to read you a few more  
 13 line -- I want to read you something from the police  
 14 report --

15 **A. Um-hum.**

16 Q. -- from Exhibit 1 --

17 **A. Um-hum.**

18 Q. -- and ask you if it's true or not.

19 And so this in Exhibit 1, this is what a  
 20 detective from the Kansas Police Department, Robert  
 21 Blehm --

22 **A. Um-hum.**

23 Q. -- says that you said to him on October 7,  
 24 2003, which was the day after your nephew Larry  
 25 White was murdered.

1 **A. Um-hum.**

2 Q. Robert Blehm wrote that -- that you told  
 3 him Mr. White stated that "On October 7, 2003,  
 4 between 3:00 a.m. and 4:00 a.m. he," meaning you,  
 5 "was in the area of 2404 East 29th Street. He  
 6 stated he went to that location to purchase crack  
 7 cocaine." Is that true; were you purchasing crack  
 8 cocaine back in October 2003?

9 **A. 2003? No, not that I can remember. I**  
 10 **wasn't smoking.**

11 Q. So did you tell that to Detective Blehm?  
 12 After Larry White was murdered, did you tell  
 13 Detective Blehm that you had gone to purchase crack  
 14 cocaine the morning after Larry White was murdered?

15 **A. No.**

16 Q. And then the next line says "He  
 17 advised" -- and Robert Blehm's talking about you  
 18 here -- "He advised while he was at that location,  
 19 he heard a guy he knows as 'O.G.' talking with some  
 20 others" --

21 (Phone rings.)

22 Q. (By Mr. Hilke) I'll start again. This is  
 23 what Robert Blehm wrote in his report, and he's  
 24 talking about you --

25 **A. Um-hum.**

1 Q. -- he wrote "He advised while he was at  
 2 that location he heard a guy he knows as 'O.G.'  
 3 talking with some others about the homicide that  
 4 occurred last night. He advised O.G. stated, 'I  
 5 blasted that,'" -- N-word -- "all the way to  
 6 Prospect and then capped his ass." Did you tell  
 7 Robert Blehm that, that you had heard O.J. --  
 8 O.G. --

9 **A. No.**

10 Q. -- say those words?

11 **A. No.**

12 Q. And is that something you would have  
 13 remembered if you had heard someone say --

14 **A. If I remember, there ain't nobody**  
 15 **talked -- talked to me nothing about, you know,**  
 16 **nothing like that.**

17 Q. All right. A little later it says, "White  
 18 identified the picture of Arnold G. Carr, Jr., black  
 19 male, February 6, 1953, as a person he knows as  
 20 'O.G.'" Is that true; did you pick out --

21 **A. No.**

22 Q. -- someone --

23 **A. No. No.**

24 Q. Just let me -- next time just let me  
 25 finish my question so the reporter can write it

1 down.

2 **A. Okay.**

3 Q. We've got to go one at a time, okay?

4 The next thing Blehm wrote was that "He,"  
 5 meaning you, "further advised that O.G. lives alone  
 6 in the apartment located at 2404 East 29th Street,  
 7 Apartment 1W, and is always armed." Is that  
 8 something you even knew about O.G. in 2003?

9 **A. No.**

10 Q. Did you tell Robert Blehm that?

11 **A. No.**

12 Q. The next one is "He advised that O.G. has  
 13 several younger unknown black males working for him,  
 14 and they are always armed as well." Is that  
 15 something you knew at the time?

16 **A. No.**

17 Q. Did you tell Robert Blehm that?

18 **A. No.**

19 Q. The next thing he wrote is that "He  
 20 advised that apartment 1W is a," quote, "crack  
 21 house," and it has been in operation for at least  
 22 six months."

23 **A. No.**

24 Q. That's not something you knew?

25 **A. No.**

<p>Page 17</p> <p>1 Q. That's not something you said?</p> <p>2 <b>A. No.</b></p> <p>3 Q. The next is "White also related that O.G.</p> <p>4 drives a purple," slash, "maroon-colored Ford</p> <p>5 Mustang that has a convertible tan top. He advised</p> <p>6 O.G. often parks the vehicle in the gravel lot to</p> <p>7 the south of 2404 East 29th Street."</p> <p>8 <b>A. No.</b></p> <p>9 Q. Is that something you knew?</p> <p>10 <b>A. No.</b></p> <p>11 Q. Is that something you told Robert Blehm?</p> <p>12 <b>A. No.</b></p> <p>13 Q. Okay. Is there anything that either</p> <p>14 Ms. Peters or I have read for you from this police</p> <p>15 report we've been -- we've just gone over together</p> <p>16 that's true?</p> <p>17 <b>THE WITNESS: What he just read to</b></p> <p>18 <b>me?</b></p> <p>19 MS. PETERS: Yes.</p> <p>20 <b>A. No. I mean, I don't know nothing about</b></p> <p>21 <b>it, but what -- what you read to me, I know I don't</b></p> <p>22 <b>know nothing about -- about the Mustang or whatever,</b></p> <p>23 <b>no. That -- that sounds like something my son might</b></p> <p>24 <b>know something about.</b></p> <p>25 Q. (By Mr. Hilke) It -- it's --</p>	<p>Page 19</p> <p>1 <b>A. -- never heard of that name before.</b></p> <p>2 Q. Did you know someone with the nickname</p> <p>3 Goldie back in 2003?</p> <p>4 <b>A. Goldie? The only girl I know Goldie, I</b></p> <p>5 <b>just met her back -- I didn't -- I didn't know her</b></p> <p>6 <b>back in 2003, but they called her "Goldie." I don't</b></p> <p>7 <b>know her real name, but they called her "Goldie." I</b></p> <p>8 <b>just met her about eight years ago.</b></p> <p>9 Q. All right. The woman named Goldie who you</p> <p>10 knew, was she in a romantic relationship or dating</p> <p>11 or hanging out with anyone in your family?</p> <p>12 <b>A. No.</b></p> <p>13 Q. Okay.</p> <p>14 <b>A. No.</b></p> <p>15 Q. One second, please. Sir, I don't have any</p> <p>16 more questions for you right now.</p> <p>17 <b>A. Okay.</b></p> <p>18 MS. PETERS: Mr. White, I don't have</p> <p>19 any more questions for you.</p> <p>20 <b>THE WITNESS: Um-hum.</b></p> <p>21 MS. PETERS: So you can get a copy of</p> <p>22 your deposition today and read it --</p> <p>23 <b>THE WITNESS: Um-hum.</b></p> <p>24 MS. PETERS: -- and make any</p> <p>25 corrections of spelling errors or things</p>
<p>Page 18</p> <p>1 <b>A. I --</b></p> <p>2 Q. I'm sorry.</p> <p>3 <b>A. Yeah.</b></p> <p>4 Q. It -- it sounds like the only true things</p> <p>5 you've identified in the report are your name,</p> <p>6 birth, and address; is that correct?</p> <p>7 <b>A. His name -- his name is the same as mine.</b></p> <p>8 <b>He's just a junior.</b></p> <p>9 Q. But your birth date is November 15 --</p> <p>10 <b>A. Right. His --</b></p> <p>11 Q. -- 1957?</p> <p>12 <b>A. Yeah, his is 26 of '83.</b></p> <p>13 Q. Okay.</p> <p>14 <b>A. 2/26 of '83.</b></p> <p>15 Q. Turn -- I'm changing topics now. I only</p> <p>16 have a few more questions for you.</p> <p>17 <b>A. Um-hum.</b></p> <p>18 Q. Do you remember someone named Lorianne</p> <p>19 Morrow?</p> <p>20 <b>A. No.</b></p> <p>21 Q. That's not someone that's known to you?</p> <p>22 <b>A. No.</b></p> <p>23 Q. What about --</p> <p>24 <b>A. Never --</b></p> <p>25 Q. I'm sorry.</p>	<p>Page 20</p> <p>1 of that nature, or you can trust that the</p> <p>2 court reporter wrote down everything you</p> <p>3 said accurately, and you can say, "I don't</p> <p>4 need a copy of the deposition transcript."</p> <p>5 Which would you like to do?</p> <p>6 <b>THE WITNESS: I don't need a copy of</b></p> <p>7 <b>it because I don't want to be involved in</b></p> <p>8 <b>it. You know, what I said -- what he</b></p> <p>9 <b>asked me, whatever I told today is true.</b></p> <p>10 <b>You know, I don't know nothing about it.</b></p> <p>11 <b>I don't even know how I got involved in</b></p> <p>12 <b>this from the get-go. How do these folks</b></p> <p>13 <b>know about me?</b></p> <p>14 MS. PETERS: Okay. We'll end the</p> <p>15 deposition.</p> <p>16 (The deposition concluded at</p> <p>17 10:23 a.m. and the witness was excused.)</p> <p>18 * * *</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

## CERTIFICATE OF REPORTER

I, Cherie L. House, a Certified Court Reporter within and for the States of Kansas and Missouri and a Registered Professional Reporter, hereby certify that the foregoing proceedings as herein set forth was first taken before me and thereafter transcribed into computer-aided transcription under my direction and control, and is a true and correct record of the proceedings reported.

I further certify that I am not a relative or employee or attorney or counsel of any of the parties, or a relative or employee of such attorneys or counsel of any of the parties, or a relative or employee of such attorneys or counsel, or financially interested in the proceedings.

*Cherie L. House*

Cherie L. House, RPR, CCR (KS, MO)

Registered Professional Reporter #18811

Certified Court Reporter #275-MO, #1707-KS

Date: June 12, 2024

<b>Exhibits</b>	<b>4</b>	12:14 13:4,5 14:8 19:3,5,6	<b>court</b> 20:2
<b>167143 White Sr, Ronald 06.04. 24 EX 1</b> 8:3,6 13:16,19	<b>4:00</b> 14:4	<b>birth</b> 8:22 18:6,9	<b>crack</b> 12:15 14:6, 7,13 16:20
<b>1</b> 8:3,6 13:16,19	<b>6</b>	<b>black</b> 15:18 16:13	<b>D</b>
<b>10:02</b> 4:9	<b>6</b> 15:19	<b>blasted</b> 15:5	<b>date</b> 8:22 18:9
<b>10:23</b> 20:17	<b>64128</b> 4:24	<b>Blehm</b> 13:21 14:2, 11,13,23 15:7 16:4,10,17 17:11	<b>dating</b> 19:10
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<b>15</b> 18:9	<b>7</b> 9:8 13:23 14:3	<b>blocks</b> 12:8	<b>days</b> 7:9
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<b>1957</b> 18:11	<b>83</b> 18:12,14	<b>brought</b> 10:13	<b>Department</b> 10:14 13:20
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<b>20</b> 6:4	<b>address</b> 4:22 8:24 18:6	<b>capped</b> 15:6	<b>detectives</b> 7:13 9:12
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